

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

FRANCIS WHITE

Criminal No. 03-CR-10356-MLW

**MOTION TO MODIFY TERMS OF**  
**PRETRIAL RELEASE**

Defendant Francis White respectfully requests that this Court modify the terms of his pre-trial release to allow him to travel with his sons before his upcoming sentencing on March 2, 2005. In support, Mr. White states as follows:

First, Mr. White seeks this Court's permission to travel to Florida (Miami and Ft. Lauderdale) with his eldest son, Anthony, between February 2 and 7, 2005.

Second, Mr. White seeks this Court's permission to travel with his youngest son, Alex. Mr. White has not yet made any travel plans, but, if granted permission, would most likely travel to Florida or Puerto Rico<sup>1</sup> between February 18 and 27, 2005 (during Alex's school vacation).

Pretrial Services Officer Thomas O'Brien has no objection to this motion, so long as Mr. White provides him an itinerary before he departs.

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<sup>1</sup> For the last three years, Mr. White has taken his son Alex to Puerto Rico for during the week of winter school vacation. Last year, Mr. White asked for and received this Court's permission for the trip.

As this Court may recall, it previously found that Mr. White is **not** a flight risk. Since that time, there has not been any change in circumstances that would warrant a different conclusion, and there is no reason to believe that Mr. White would not return to Massachusetts to face the charges against him. In fact, this Court has granted similar motions in the past.

WHEREFORE, Mr. White respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel to Florida between February 2 and 7, 2005, and to Florida or Puerto Rico between February 18 and 27, 2005.

RESPECTFULLY SUBMITTED,  
FRANCIS WHITE

By his attorneys,

/s/ Richard M. Egbert  
Patricia A. DeJuneas, BBO 652997  
Richard M. Egbert, BBO 151800  
99 Summer Street, Suite 1800  
Boston, MA 02110  
(617) 737-8222

**CERTIFICATE OF SERVICE**

I, Patricia A. DeJuneas, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Heidi Brieger by first class mail, this 3<sup>rd</sup> day of January, 2005.

/s/ Richard M. Egbert  
Richard M. Egbert